

UNITED STATES OF AMERICA)

v.)

Manning, Bradley E.)
PFC, U.S. Army,)
HHC, U.S. Army Garrison,)
Joint Base Myer-Henderson Hall)
Fort Myer, Virginia 22211)

STIPULATION OF
EXPECTED TESTIMONY

Ms. Tasha M. Thian

16 June 2013

It is hereby agreed by the Accused, Defense Counsel, and Trial Counsel, that if Ms. Tasha M. Thian were present to testify during the merits and pre-sentencing phases of this court-martial, she would testify substantially as follows:

1. I am the Agency Records Officer, Office of Information Programs and Services, U.S. Department of State. In this position, I set policy and procedures for the management of records within the Department. I am the Department Official responsible for Department of State records. I am the head of a division of twenty-five employees. The duties of these employees include records analysis, website management, records scheduling activities, and records review. I am a certified records manager with thirty-one years of service with the Federal Government. I am responsible for the Foreign Affairs Manual and Handbook sections on records management. I have been the Agency Records Officer since August 2007.

2. A cable is an official message of the Department of State. Cables can be sent between posts or between posts and State Department headquarters. When a cable is sent, a record copy of the cable is automatically captured in the State Archiving System (SAS). The SAS contains classified cables at the Secret level and below since 1973. There are approximately 400,000 new Department cables stored in the SAS annually.

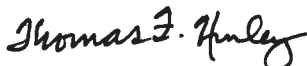
3. Cables are identified by the Message Record Number (MRN) assigned to each cable. An MRN has three parts. The first part of the MRN is the two-digit year the cable was created. The second part is the name of the post that created the cable. The third part is the sequence number of the cable. For example, 05Algiers1836 would be the 1,836th cable sent by Embassy Algiers in 2005.

4. I reviewed and printed directly from the SAS the cables (BATES numbers: 00505328-00505808) listed in **Prosecution Exhibit (PE) 151 for Identification**. On 6 December 2012, I also attested to the authenticity of these cables in a document with the BATES numbers: 00527342-00527346. This authentication memorandum was written on Department of State letterhead and accompanied by the Department seal and the Secretary's signature verifying my authority. With this memorandum, I attested that each of the listed records was made at or near the time of the occurrences of the matters set forth therein. Each record was made by, or from information transmitted by, people with knowledge of those matters. The records were kept in the course of the Department's regularly conducted business activities, and it was the regular practice of such business activities to make these records. I also certified that the records listed in **PE 151 for ID** are true copies of the original records contained within the files of the Department of State.

5. **PE 98 for ID** contains the Net Centric Diplomacy version of the above referenced cables and the same cables in **Appellate Exhibit (AE) 501**. The formatting of the cables listed in **PE 98 for ID** and **AE 501** is different than the cables in SAS, but the text and content are the same.



ANGEL M. OVERGAARD
CPT, JA
Assistant Trial Counsel



THOMAS HURLEY
MAJ, JA
Defense Counsel



BRADLEY E. MANNING
PFC, USA
Accused